Remarks

A. Pending Claims

Claims 1-4, 6-8, 10, 12-15, 17-22, 24, 29-34, 36, 38-46, 52-62, and 71 are pending. Claims 1, 13, and 18 have been amended.

B. The Claims Are Not Obvious over Borghesi in View of Hoover and Further in View of Richards Pursuant To 35 U.S.C. § 103(a)

The Examiner rejected claims 1-4, 6-8, 10, 12-15, 17-22, 24, 29-34, 36, 38-46, 52-62, and 71 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,950,169 to Borghesi et al. (hereinafter "Borghesi") in view of U.S. Patent No. 5,724,575 to Hoover et al. (hereinafter "Hoover") in view of U.S. Patent No. 6,408,303 to Richards (hereinafter "Richards"). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner et al.,* 379 F.2d 1011, 154 USPQ 173, 177-178 (CCPA 1967). To establish a *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP § 2143.03.

Claims 1, 13, and 18 have been amended to describe:

> determining whether to apply one or more source-side functions to the one or more source fields; and, if a source-side function is applied to the one or more source fields, associating one or more source-side functions with the one or more selected source fields, wherein the source-side functions modify the additional information added to the destination field from the one or more selected source fields; wherein the value of each destination field is the resulting value of the sum of the values of the selected source fields after application of the source-side function; and
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> determining whether to apply a destination-side function to one or more of the destination fields; and, if a destination-side function is applied to the

> destination fields, associating one or more destination-side functions with the one or more of the selected destination fields, wherein the destination-side functions modify the additional information added to the destination field from the associated source fields, wherein the value of the destination field is the resulting value of first summing the values of the associated source fields and then applying the destination-side function;

Support for the amendments to claims 1, 13, and 18 may be found, for example, in Applicant's Specification on page 18, line 23 to page 20, line 27; page 23, line 19 to page 24, line 12; and FIG. 11. Applicant submits that the cited art, separately or in combination, does not appear to teach or suggest at least these features of claims 1, 13, and 18 in combination with the other features of the claim.

The Office Action asserts that Hoover discloses associating one or more source-side functions with one or more selected source fields, wherein the source-side functions modify additional information added to a destination field from one or more selected source fields. The Office Action relies on a 31-column portion of Hoover in support of this assertion. Applicant respectfully disagrees that Hoover discloses this feature. Hoover appears to disclose an object broker that manages a global object identifier address space and maintains various tables that relate the location and status of information pertaining to various objects. For example, Hoover states:

> In order to accomplish these tasks, the object broker 20 carries out two principal functions: First, to manage a global object identifier address space and allocate ranges of address space to the various remote user computers, and second to maintain various tables that relate the location and status of information pertaining to various objects. The object broker computer 20 is programmed to carry out these two basic functions. These computing functions are not necessarily programmed in object-oriented form, but it should be understood that the programming is transparent (i.e., invisible) to the users. In other words, the users at the remote client sites 12 are not directly involved with creation of object identifiers, with global object address space allocation, or maintenance of any tables relating location or status pertaining to the various objects.
> (Hoover, column 22, lines 12-17)

The object broker appears to maintain a map table which stores information relating particular object identifiers, that have been assigned to particular instances of objects, to locations of data relating to those objects at various remote databases.

> Another function carried out by the object broker 20 is maintenance of a map table 120 and one or more object index tables 130a, 130b . . . 130n. The contents of the map table and index tables are described in greater detail in later figures. For the present, suffice it to say that the map table 120 stores information relating particular object identifiers that have been assigned to particular instances of objects, to locations of data relating to those objects at the various remote databases RDBn. The index tables 130 comprise an index for each type of object modeled in the system that can be searched. The index tables relate search fields or data items to particular object identifiers. In other words, the index tables 130 are preconstructed based on information provided by the remote databases after the creation of an object and assignment of an object identifier.
> (Hoover, column 23, lines 4-12).

Hoover does not appear to teach or suggest associating one or more source-side functions with one or more selected source fields, wherein the source-side functions modify additional information added to a destination field from one or more selected source fields. In any event, Hoover does not appear to teach or suggest determining whether to apply one or more source-side functions to the one or more source fields; and, if a source-side function is applied to the one or more source fields, associating one or more source-side functions with the one or more selected source fields, wherein the source-side functions modify the additional information added to the destination field from the one or more selected source fields; wherein the value of each destination field is the resulting value of the sum of the values of the selected source fields after application of the source-side function; and determining whether to apply a destination-side function to one or more of the destination fields; and, if a destination-side function is applied to the destination fields, associating one or more destination-side functions with the one or more of the selected destination fields, wherein the destination-side functions modify the additional information added to the destination field from the associated source fields, wherein the value of the destination field is the resulting value of first summing the values of the associated source fields and then applying the destination-side function.

Applicant submits that, for at least the reasons stated above, the combination of the features of claims 1, 13, and 18 are not taught or suggested by the cited art.

Applicant submits that many of claims dependent on claims 1, 13, and 18 are independently patentable. For example, claim 40 describes a combination of features including: "wherein the at least one outgoing transaction is an annuity asset pricing transaction." Claim 41 describes a combination of features including: "wherein the at least one outgoing transaction is a positions and valuation focused refresh transaction." Claim 42 describes a combination of features including: "wherein the at least one outgoing transaction is a positions and valuation full refresh transaction." As used in the instant application, annuity asset pricing transactions, positions and valuation focused refresh transactions, and positions and valuation full refresh transactions relate to annuity contracts. As stated in Applicant's specification:

> Positions and valuations full refresh (PVF) is a transaction involving the financial and non-financial information about an annuity contract at a particular point in time. The PVF includes contract data such as valuations, replacements, producer information, owner information, and payor information. Positions and valuations focused refresh (PFF) is also a transaction involving the financial and non-financial information about an annuity contract at a particular point in time. The PFF record is a shorter version of the PVF record and includes the data and value for each contract. Annuity asset pricing (AAP) is a transaction involving the pricing or unit value of the underlying variable investment funds supporting a contract.
> (Specification, page 2, lines 21-29)

The Office Action acknowledges that Borghesi does not disclose the above-quoted features of claims 40-42. Nevertheless, the office action takes the position that "such transactions are well known in the art." The Office Action appears to rely on facts within the personal knowledge of the Examiner. Pursuant to MPEP §2144.03, Applicant respectfully requests the Examiner provide support for her assertion either by affidavit or by references brought to the Applicant's attention, or that the rejection be removed.

C. Additional Remarks

Based on the above, Applicant submits that all claims are in condition for allowance. Favorable reconsideration is respectfully requested.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-23300/EBM.

Respectfully submitted,

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